

Andrew Isar, *Director - State Affairs*

Telecommunications
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FILED

APR 18 2000

By Overnight Mail

INDIANA UTILITY REGULATORY COMMISSION

11 April 2000

Mr. Joseph Sutherland
Indiana Regulatory Commission
Indiana Government Center South
302 West Washington Street, Suite E306
Indianapolis, IN 46204

Re: In The Matter Of The Investigation Into Ameritech Corporation's Compliance
with Section 271 of the Telecommunications Act of 1996, Cause No. 41657

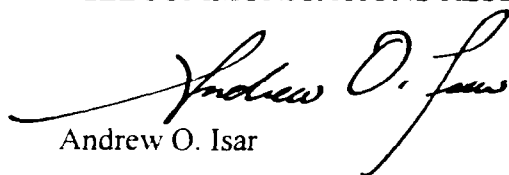
Dear Mr. Sutherland:

Enclosed are an original and two (2) copies of the Petition for Leave to Intervene of the
Telecommunications Resellers Association ("TRA") in the above-referenced docket.

Questions may be directed to me.

Sincerely,

TELECOMMUNICATIONS RESELLERS ASSOCIATION



Andrew O. Isar

Enclosure

BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION

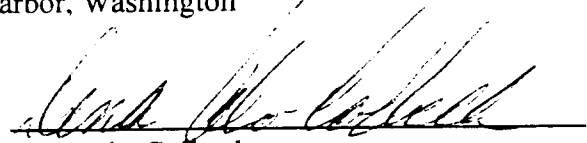
In The Matter Of the Investigation Into:)

Ameritech Corporation's)
Compliance with Section 271 of the)
Telecommunications Act of 1996)
Cause No. 41657

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the Petition For Leave to Intervene of the Telecommunications Resellers Association on all parties of record in this proceeding, as listed in the following service list, via United States Mail, postage prepaid.

Dated this 11th Day of April, 2000 at Gig Harbor, Washington


Dena Alo-Colbeck

Karol H. Krohn
Office of Utility Consumer Counselor
Indiana Government Center North
100 North Senate Avenue, Room N501
Indianapolis, Indiana 46204

Pamela H. Sherwood
Sommer & Barnard, P.C.
111 Monument Circle #4000
P.O. Box 44363
Indianapolis, Indiana 46244-0363

Sue E. Stemen
Ameritech Indiana
240 N. Meridian Street, Room 1826
Indianapolis, Indiana 46204

Marsha Schermer
Time Warner Communications
250 Old Wilson Bridge Road, Suite 130
Columbus, Ohio 43085

Douglas W. Trabaris
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AT&T Corp.
222 West Adams Street, 15th Floor
Chicago, Illinois 60606
(312) 230-2561
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Michael J. Huston
Michael E. Allen
Baker & Daniels
300 North Meridian Street, Suite 2700
Indianapolis, Indiana 46204
(317) 237-0300
(317) 237-1000 (fax)

BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION

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INDIANA UTILITY
REGULATORY COMMISSION

In the Matter of the Investigation Into:

Ameritech Corporation's

Compliance with Section 271 of the
Telecommunications Act of 1996

Cause No. 41657

PETITION FOR LEAVE TO INTERVENE OF
THE TELECOMMUNICATIONS RESELLERS ASSOCIATION

The Telecommunications Resellers Association ("TRA"), on behalf of its members and pursuant to 170 IAC 1-1-9 of the rules and regulations of the Indiana Utility Regulatory Commission ("Commission"), hereby respectfully moves the Commission for leave to intervene in the above-captioned proceeding. In support of its application, TRA submits the following:

1. TRA is a national industry association representing nearly 650 telecommunications service providers and suppliers throughout the United States including six Indiana-based members. TRA's members are generally small to medium-sized telecommunications service providers. TRA members offer a variety of value-added competitive interexchange, local, wireless, Internet, and enhanced services to the public. Several TRA members are authorized by the Commission to provide competitive local and interexchange services in the state of Indiana.

2. As service providers who compete and who will compete with Ameritech Corporation ("Ameritech"), TRA members have a direct and substantial interest in the matters raised by Ameritech's compliance with the Telecommunications Act of 1996 ("the Act")¹. The conditions under which Ameritech enters the interLATA market will have a profound impact on members' ability to compete in Indiana, particularly if Ameritech's entry into the interLATA market is premature, i.e., Ameritech has not fully opened its local market to competitors. TRA

believes that it is critical that Ameritech fully and completely demonstrate its compliance with Section 271 of the Telecommunications Act of 1996.

3. TRA was involved as a party of record in the Commission's prior investigation into Ameritech's compliance with Section 271 of the Act, opened in 1996 under Docket No. 40641.

4. TRA wishes to intervene for the specific purpose of monitoring this proceeding and submitting comments and a brief concerning Ameritech's petition for in-region interLATA market entry pursuant to Section 271 of the Act. TRA does not intend to sponsor witnesses or engage in cross-examination of witnesses. The proposed intervention by TRA will not unduly broaden the issues involved in this proceeding or prejudice other parties.

5. The name and address of the individual to receive documents and communications regarding this proceeding is:


Andrew O. Isar
Director – State Affairs
Telecommunications Resellers Association
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98335
Telephone: (253) 851.6700
Facsimile: (253) 851.6474
Email: aisar@millerisar.com

WHEREFORE, the Telecommunications Resellers Association respectfully requests that the Commission grant its Petition for Leave to Intervene in this proceeding.

Respectfully submitted,

Telecommunications Resellers Association

BY:


Andrew O. Isar
Director – State Affairs
3220 Uddenberg Lane, Suite 4
Gig Harbor, WA 98335
Telephone: (253) 851.6700
Facsimile: (253) 851.6474

11 April 2000

¹ Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996), *codified at* 47 U.S.C. § 151 *et seq.*

BEFORE THE
INDIANA UTILITY REGULATORY COMMISSION

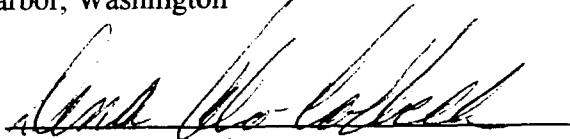
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